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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) No. CR 07-00705 SI
14 Plaintiff,)
15 v.)
16 EDMUND JEW,)
17 Defendant.)
18 _____)

STIPULATION AND [PROPOSED] ORDER
EXCLUDING TIME FROM MARCH 21, 2008
TO JULY 7, 2008 FROM THE SPEEDY
TRIAL ACT CALCULATION (18 U.S.C.
§ 3161(h)(8))

20
21 The parties appeared before the Court on Friday, March 21, 2008, for the hearing
22 on the Defendant's Motion for Request for Evidentiary Hearing, filed on February 19,
23 2008. At that time, the Court denied the Motion and set a trial date of July 7, 2008. The
24 parties stipulated and agreed as follows:

25 1. The parties agreed to an exclusion of time under the Speedy Trial Act from
26 March 21, 2008 to July 7, 2008, in light of the need for the defendant's counsel to review
27 discovery, do additional translations, and prepare for what is expected to be a three-week
28 trial. Failure to grant the requested continuance would unreasonably deny defense

1 counsel reasonable time necessary for effective preparation, taking into account the
2 exercise of due diligence and the need for counsel to review the discovery with the
3 defendant, and would deny the defendant continuity of counsel. 18 U.S.C.
4 § 3161(h)(8)(B)(iv).

5 2. Given these circumstances, the Court found that the ends of justice served
6 by excluding the period from March 21, 2008 to July 7, 2008 outweigh the best interest of
7 the public and the defendant in a speedy trial. Id. § 3161(h)(8)(A).

8 IT IS SO STIPULATED.

9
10 Respectfully submitted,

11 Date: 4/3/08

12 /s/
13 MICHAEL LI-MING WANG
TRACIE L. BROWN
14 Assistant United States Attorneys

15 Date: 4/4/08

16 /s/
17 STUART F. HANLON
Counsel for Defendant Edmund Jew

[PROPOSED] ORDER

Upon stipulation of the parties, and good cause appearing, IT IS ORDERED that, with the consent of the defendant, the period from March 21, 2008, to July 7, 2008, is excluded from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(8)(A) & (B)(iv), as the ends of justice served by excluding that time outweigh the best interest of the public and the defendant in a speedy trial and the prompt disposition of criminal cases.

DATED:

THE HON. SUSAN ILLSTON
United States District Judge